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LSI Corporation and  
Agere Systems LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

BARNES & NOBLE, INC. and  
BARNESANDNOBLE.COM LLC,

Plaintiffs,

v.

LSI CORPORATION and  
AGERE SYSTEMS LLC,

Defendants.

Case No. 11-cv-02709 EMC

**JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
AMENDMENT TO MARCH 25, 2013  
CASE MANAGEMENT ORDER**

Trial Date: None set

Pursuant to Local Rule 6-2, Plaintiffs Barnes & Noble, Inc. and barnesandnoble.com llc  
("Plaintiffs") and Defendants LSI Corporation and Agere Systems LLC ("Defendants")  
(collectively, the "Parties"), stipulate as recited below and jointly request that the Court amend  
the current case management schedule as set forth below.

REVISED STIPULATION REGARDING  
AMENDMENT TO MARCH 25, 2013 CASE  
MANAGEMENT ORDER

CASE NO.: 11-CV-02709 EMC

1 WHEREAS, the Court, by Order dated March 25, 2013 (Dkt. No. 193), reset the dates for  
2 the briefing schedule for claim construction, under which LSI's opening claim construction brief  
3 is due May 10, 2013;

4 WHEREAS, a hearing is scheduled for May 16, 2013 on Defendants' Motion for Leave to  
5 Amend Infringement Contentions and Counterclaims (Dkt. No. 200) ("Motion for Leave");

6 WHEREAS, as stated in briefing submitted in connection with LSI's Motion for Leave,  
7 the Parties have agreed that if the Court grants LSI's Motion for Leave, then the parties will  
8 propose a consolidated claim construction briefing schedule for Defendants' Asserted and  
9 Supplemental Patents;

10 WHEREAS, Plaintiffs do not agree with Defendants' proposal regarding further  
11 scheduling (Dkt. No. 212 at 3);

12 WHEREAS the Parties anticipate that, if the Court grants LSI's Motion for Leave, then  
13 the Parties will meet and confer and advise the Court regarding an appropriate schedule for  
14 further consolidated proceedings on Defendants' Asserted and Supplemental Patents;

15 WHEREAS, the Parties have met and conferred to discuss a proposal that all claim  
16 construction briefing be stayed pending resolution of LSI's Motion for Leave, or in the  
17 alternative, to extend claim construction briefing deadlines on an interim basis for a minimum of  
18 one week in light of the May 16, 2013 hearing date;

19 WHEREAS, the Parties do not expect that these revisions will impact any other dates  
20 already fixed by Court Order;

21 ~~THE PARTIES HEREBY STIPULATE, subject to Court approval, that claim~~  
22 ~~construction briefing will be temporarily stayed pending resolution of LSI's Motion for Leave;~~

23 FURTHERMORE the parties request, in the alternative, that all claim construction  
24 briefing deadlines be extended on an interim basis by one week.

1 Dated: May 6, 2013

FENWICK & WEST LLP

2  
3 By: /s/ Ravi Ranganath

4 Ravi Ranganath

Attorneys for Defendants

LSI Corporation and Agere Systems LLC

5  
6 Dated: May 6, 2013

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

7  
8 By: /s/ Carl G. Anderson

9 Carl G. Anderson

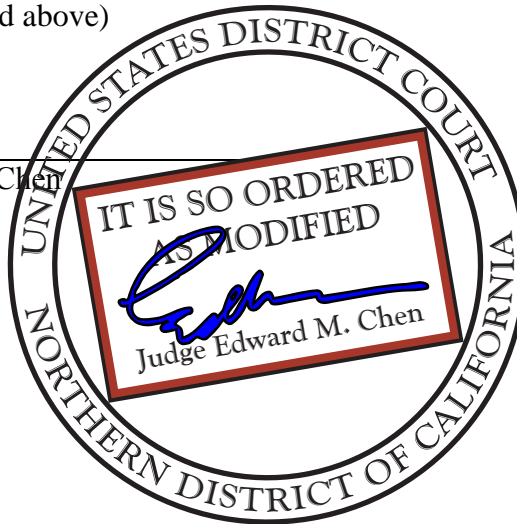
Attorneys for Plaintiffs

Barnes & Noble, Inc. and

barnesandnoble.com llc

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11  
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13  
14 PURSUANT TO STIPULATION, IT IS SO  
15 ORDERED. (as modified above)

16  
17  
18 The Honorable Edward M. Chen  
United States District Judge



**ATTESTATION PURSUANT TO GENERAL ORDER 45**

Pursuant to General Order No. 45, § X(B), regarding signatures, I attest under penalty of perjury that the concurrence in the filing of this document has been obtained from its signatories.

Dated: May 6, 2013

FENWICK & WEST LLP

By: /s/ Ravi Ranganath

Ravi Ranganath  
Attorneys for Defendants  
LSI Corporation and Agere Systems LLC

FENWICK & WEST LLP  
ATTORNEYS AT LAW  
MOUNTAIN VIEW